

Letter of Appeal

Schools and Libraries Division - Correspondence Unit
30 Lanidex Plaza West
PO Box 685
Parsippany, NJ 07054-0685

Form 471 Number: 940708
Funding Request Number: 2595958, 2595964, 25999710
Billed Entity Number: 126511
Applicant Name: Richmond Public Library

Contact: Melissa Zaruba, Consultant
E-Rate Central
14504 Bent Creek Court
Midlothian, VA 23112

Richmond Public Library (Richmond) requests the Schools and Libraries Division (Administrator) modify its 2014 application as expressed in its RAL correction submitted, but not processed, prior to the FCDL issue date.

Discussion

On March 28, 2014 Richmond's representative emailed a RAL correction to the Administrator requesting an increase to the discount rate from Block 4 to match that of the Richmond Public Schools' application (email attached). Also included in this RAL correction was a request to reduce FRN2595964 to reflect more accurately the expected monthly charges. This request was submitted within hours of the discrepancies being discovered, but was apparently never forwarded to the reviewer of the application.

Richmond followed the directions outlined in the Administrator's News Brief published March 29, 2013 (see footnote). The Administrator has specific guidance when applicants find they must make a correction:

"You should submit RAL corrections as soon as you notice an error...you can submit corrections up until the time that USAC issues an FCDL..."¹

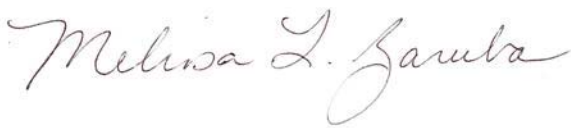
¹ E-rate Central Web Site: http://www.e-ratecentral.com/sld_news_briefs/480.pdf

On May 19, 2014, Richmond received its FCDL from the Administrator stating “The applicant did not submit any RAL corrections.” No questions were asked during the review process, so Richmond was never aware that their request had not made it to the appropriate person. The submission was emailed to the Administrator nearly 7 weeks prior to the FCDL being issued; there was no reason to believe it had not been received and that it should be submitted again.

Conclusion

Richmond asks the Administrator to increase the discount rate to that of its local school division (90%) and reduce FRN 2595964 as noted on the RAL correction.

Respectfully submitted this 10th day of July, 2014,

A handwritten signature in cursive script that reads "Melissa L. Zaruba". The ink is dark and the signature is fluid, with a large, stylized 'M' and 'Z'.

Melissa Zaruba
Consultant to Richmond Public Library

Melissa L. Zaruba

From: Melissa L. Zaruba <mzaruba@e-ratecentral.com>
Sent: Friday, March 28, 2014 1:41 PM
To: 470RNLCorrections@sl.universalservice.org
Subject: Richmond City Library RAL Correction
Attachments: 2014 Richmond 471 RAL.pdf

Please find attached RAL correction for Richmond City Public Library (BEN 126511) for application 940708.

Thank you,

Melissa Zaruba

[E-Rate Central](#)

Mid-Atlantic Office
14504 Bent Creek Court
Midlothian, VA 23112
Phone: 516.801.7844
Fax: 516.801.7854



Schools and Libraries Division

FORM 471 RECEIPT ACKNOWLEDGMENT LETTER
(Funding Year 2014: 07/01/2014 - 06/30/2015)

March 13, 2014

Melissa Zaruba
RICHMOND PUBLIC LIBRARY
14504 Bent Creek Court
Midlothian, VA 23112

Re: Form 471 Application Number: 940708
Funding Year 2014: 07/01/2014 - 06/30/2015
Applicant's Form Identifier: Richmond2014
Billed Entity Number: 126511

Your certified FCC Form 471, "Services Ordered and Certification Form," requested \$107,538.96 in total Schools and Libraries Program (Program) pre-discount costs for services. A copy of this information has been provided to the service provider(s) whose Service Provider Identification Number(s) (SPIN) is featured on this Form 471.

USAC provides a separate Form 471 Receipt Acknowledgment Letter (RAL) with a RAL Funding Requests Report (Report) for each application certified within the application window. The Report summarizes the information provided to USAC. A space is provided for you to make allowable corrections to any clerical errors or errors that you realize may result in reduction or denial of funding. USAC will perform a complete analysis before funds are committed. If additional errors are found during our review we will attempt to contact you for clarification before making a decision that results in denials or reductions.

Review this Report to verify that the information accurately reflects your request. If the information is accurate, file this letter with your records.

DO NOT SEND CORRECTIONS TO THE CLIENT SERVICE BUREAU. To make corrections, please do the following:

- Corrections may be made until a Funding Commitment Decision Letter for this FCC Form 471 application is issued.
- If you would like to request a correction to a field that does not appear in the attached Report, print a copy of your FCC Form 471 and clearly note your requested correction.
- If contact information provided above is incorrect, note any correction above and submit a signed copy of this page as a correction.
- Indicate any corrections you wish to make in the Report in the spaces indicated.
- Sign where indicated, and provide your name, title, contact information and date.
- Submit a copy of your marked-up RAL to the email address, fax number or mailing address posted in the "Ministerial & Clerical Errors" page of our website.
- Retain a copy of the RAL and any submitted corrections.

REMINDERS REGARDING THE RAL

- This letter does NOT contain any decisions concerning your requests for discounts.
- Funding requests that did not pass Minimum Processing Standards are not included in the Report following this letter.
- See "Guide to USAC Letter Reports" posted in the Reference Area of our website for a description of each individual field in the following Report.

Schools and Libraries Division - Correspondence Unit
30 Lanidex Plaza West, PO Box 685, Parsippany, NJ 07054-0685
Visit us online at: www.usac.org/sl

- If you would like to view an FCC Form 471 application, click the "Display" button in the Apply Online Area of the website. Enter the Application Number where indicated. Use the print feature on your browser to print any portion of your FCC Form 471 or the entire application as displayed for your records or to include with any corrections submitted.

GENERAL REMINDERS

- Submit your Item 21 attachments if you haven't already done so. See "Item 21 Attachments" posted on our website.
- Retain documentation showing that you have complied with all statutes and Federal Communications Commission rules. See "Document Retention" posted in the Reference Area of our website.
- Retain all required documents for a period of at least five years after the last day of service delivered.
- Budgeted funds to provide necessary resources must NOT be provided directly or indirectly by a service provider. See FCC Form 471, Block 6, Item 26 Certification and instructions.
- Respond promptly to any USAC requests for clarification or additional information.
- A USAC-certified Technology Plan Approver MUST approve your technology plan before discounted services begin. See "Technology Planning" on our website.
- Work with your service provider(s) to ensure timely delivery of discounted services.

COMPLETE PROGRAM INFORMATION is posted on our website. You may also contact our Client Service Bureau using the "Submit a Question" link on our website, toll-free by fax at 1-888-276-8736 or toll-free by phone at 1-888-203-8100. DO NOT SEND CORRECTIONS TO THE CLIENT SERVICE BUREAU.

Schools and Libraries Division
Universal Service Administrative Company

Form 471 940708 RAL Funding Requests Report

THIS REPORT DOES NOT CONTAIN ANY DECISIONS CONCERNING YOUR REQUESTS FOR DISCOUNTS.

USE THIS REPORT TO LIST OR INDICATE CORRECTIONS YOU WISH TO MAKE TO YOUR FCC FORM 471.

Follow the guidance posted on the "Ministerial & Clerical Errors" page on our website to make allowable corrections. All corrections - including corrections to new fields - are subject to review for Program compliance and approval.

Corrections Submitted by:

Signature: Melissa L. Zaruba Date: 3-28-14

Printed Name: Melissa Zaruba

Title: Consultant

Email, Fax Number or Phone Number: mzaruba@e-ratecentral.com

Item	Data Entered on FCC Form 471	Make Corrections Here
1a. Name of Billed Entity	RICHMOND PUBLIC LIBRARY	Corrections Not Allowed
3. Billed Entity Number	126511	Corrections Not Allowed
6. Contact Person's Name	Melissa Zaruba	Corrections Not Allowed
6. Preferred mode of contact	Email	
6c. Contact Phone	516-801-7844	
6d. Contact Fax	516-801-7854	
6e. Email	mzaruba@e-ratecentral.com	
6f. Holiday/vacation/summercontact information - if provided		

6g. Consultant Name: Melissa Zaruba
 Consultant Number: 16060891
 Consultant Employer: E-Rate Central

The Billed Entity name, address, phone and fax numbers cannot be changed via the RAL correction process.

Correction on FRN 2595964
 and change Block 4 to match
 Richmond City Public Schools reported
 numbers from the Dec 2013 NSLP
 report (can be seen in App 946627.

Block 4

While the RAL does not contain Block 4 Worksheet Information, you are allowed to make the following modifications:

- Delete entities from Block 4
- Add entities to Block 4
- Correct any Block 4 information for an entity (RAL corrections are not required for student counts that don't affect your Program discount.)

To delete an entity;

Provide a separate page stating that you wish to delete the entity and provide:

Application #
Worksheet #
Entity #
Entity Name

To add an entity;

Include an additional page from a blank FCC Form 471 Block 4 Worksheet, available on the "Forms" page on our website. All fields must be completed. Indicate the worksheet number to which this entity should be added or indicate if a new worksheet should be created.

To correct an entity;

Print the Block 4 worksheet for your FCC Form 471 application using the 'Display' button in the Apply Online area of our website and make corrections to the appropriate field.

Block 5

USAC may require additional information before making requested corrections to certain fields in Block 5 such as Category of Service, Contract Award or Expiration Dates, etc.

Follow the instructions above to print a copy of the Block 5 Discount Funding Request (FRN) to correct information not included in the Report, such as the broadband services and connectivity information you provided in Item 24.

Form 471 940708 RAL Funding Requests Report

ERN: 2595958

IF YOU WISH TO CANCEL THIS ERN, PLEASE CHECK HERE _____

Item #	Data Entered on FCC Form 471	Make Corrections Here
11. Category of Service	Telecommunications Service	
12. 470 App#	117610001159164	
13. SPIN	143000677	
14. Service Provider Name Verizon Wireless (Cellco Partnership)		
15b. Contract Number	MTM	
16a. Billing Account Number	505427807-00001	
16b. Multiple Billing Account Numbers	N	
18. Contract Award Date		
19. Service Start Date	07/01/2014	
20a. Service End Date	06/30/2015	
20b. Contract Expiration Date		
22. Block 4 Entity or Worksheet No	1622911	
23a. Monthly Charges	\$79.98	
23b. Ineligible Monthly Amt	\$0.00	
23c. Eligible Monthly Amt	\$79.98	
23d. Number of months of service	12	
23e. Annual pre-discount Amount for eligible recurring charges	\$959.76	Calculated - Not Input
23f. Annual Non-Recurring (One-Time) Charges	\$0.00	
23g. Ineligible Non-Recurring Amt	\$0.00	
23h. Annual pre-discount amount for eligible non-recurring charges	\$0.00	Calculated - Not Input
23i. Total Pre-discount Amt	\$959.76	Calculated - Not Input
23j. Discount from Block 4	80	See Block 4 Above
23k. Funding Commitment Request	\$767.81	Calculated - Not Input
26f. Service provider assistance with funding	No	

Form 471 940708 RAL Funding Requests Report

FRN: 2595964

IF YOU WISH TO CANCEL THIS FRN, PLEASE CHECK HERE _____

Item #	Data Entered on FCC Form 471	Make Corrections Here
11. Category of Service	Telecommunications Service	
12. 470 App#	117610001159164	
13. SPIN	143001422	
14. Service Provider Name	Verizon Virginia LLC	
15b. Contract Number	MTM	
16a. Billing Account Number	Multiple	
16b. Multiple Billing Account Numbers	Y	
18. Contract Award Date		
19. Service Start Date	07/01/2014	
20a. Service End Date	06/30/2015	
20b. Contract Expiration Date		
22. Block 4 Entity or Worksheet No	1622911	
23a. Monthly Charges	\$8,100.00 6312.00	
23b. Ineligible Monthly Amt	\$0.00	
23c. Eligible Monthly Amt	\$8,100.00 6312.00	
23d. Number of months of service	12	
23e. Annual pre-discount Amount for eligible recurring charges	\$97,200.00	Calculated - Not Input
23f. Annual Non-Recurring (One-Time) Charges	\$0.00	
23g. Ineligible Non-Recurring Amt	\$0.00	
23h. Annual pre-discount amount for eligible non-recurring charges	\$0.00	Calculated - Not Input
23i. Total Pre-discount Amt	\$97,200.00	Calculated - Not Input
23j. Discount from Block 4	80	See Block 4 Above
23k. Funding Commitment Request	\$77,760.00	Calculated - Not Input
26f. Service provider assistance with funding	No	

Form 471 940708 RAL Funding Requests Report

FRN: 2599710

IF YOU WISH TO CANCEL THIS FRN, PLEASE CHECK HERE _____

Item #	Data Entered on FCC Form 471	Make Corrections Here
11. Category of Service	Telecommunications Service	
12. 470 App#	117610001159164	
13. SPIN	143001422	
14. Service Provider Name	Verizon Virginia LLC	
15b. Contract Number	MTM	
16a. Billing Account Number	76296239 71Y	
16b. Multiple Billing Account Numbers	N	
18. Contract Award Date		
19. Service Start Date	07/01/2014	
20a. Service End Date	06/30/2015	
20b. Contract Expiration Date		
22. Block 4 Entity or Worksheet No	1622911	
23a. Monthly Charges	\$781.60	
23b. Ineligible Monthly Amt	\$0.00	
23c. Eligible Monthly Amt	\$781.60	
23d. Number of months of service	12	
23e. Annual pre-discount Amount for eligible recurring charges	\$9,379.20	Calculated - Not Input
23f. Annual Non-Recurring (One-Time) Charges	\$0.00	
23g. Ineligible Non-Recurring Amt	\$0.00	
23h. Annual pre-discount amount for eligible non-recurring charges	\$0.00	Calculated - Not Input
23i. Total Pre-discount Amt	\$9,379.20	Calculated - Not Input
23j. Discount from Block 4	80	See Block 4 Above
23k. Funding Commitment Request	\$7,503.36	Calculated - Not Input
26f. Service provider assistance with funding	No	

Schools and Libraries Universal Service Program
Services Ordered and Certification Form 471
Application Display

Block 1

Block 2 & 3

Block 5

Block 6

Misc

471 Application No: 940708
 Form Status: CERTIFIED - In Window
 Out of Window Letter Date: Not applicable

Funding Year: 7/1/2014 - 6/30/2015
 RAL Date: 03/13/2014

Cert. Postmark Date: 02/26/2014

Block 4: Worksheets

Worksheet B No: 1622911 Library Outlets/Branches: 9
 Sum. Discount (Sum. Column 4): 720 Shared Discount: 80%

1. Library Name: BELMONT BRANCH LIBRARY FSCS: VA 0068 003

2. Entity Number: 25098

New Library Construction: N

Administrative Entity: N

Non Instructional Facility: N

Urban/Rural: Urban

Alt. Disc. Mech.: N

3. School District where library outlet/branch is located: RICHMOND PUBLIC SCHOOLS

4. Discount: ~~80%~~ 90

1. Library Name: BROAD ROCK BRANCH LIBRARY FSCS: VA 0068 004

2. Entity Number: 25141

New Library Construction: N

Administrative Entity: N

Non Instructional Facility: N

Urban/Rural: Urban

Alt. Disc. Mech.: N

3. School District where library outlet/branch is located: RICHMOND PUBLIC SCHOOLS

4. Discount: ~~80%~~ 90

1. Library Name: EAST END BRANCH LIBRARY FSCS: VA 0068 005

2. Entity Number: 25110

New Library Construction: N

Administrative Entity: N

Non Instructional Facility: N

Urban/Rural: Urban

Alt. Disc. Mech.: N

3. School District where library outlet/branch is located: RICHMOND PUBLIC SCHOOLS

4. Discount: ~~80%~~ 90

1. Library Name: GINTER PARK BRANCH LIBRARY FSCS: VA 0068 006

2. Entity Number: 25171

New Library Construction: N

Administrative Entity: N

Non Instructional Facility: N

Urban/Rural: Urban

Alt. Disc. Mech.: N

3. School District where library outlet/branch is located: RICHMOND PUBLIC SCHOOLS

4. Discount: ~~80%~~ 90

1. Library Name: HULL STREET LIBRARY FSCS: VA 0068 007

2. Entity Number: 212144

New Library Construction: N

Administrative Entity: N

Non Instructional Facility: N

Urban/Rural: Urban

Alt. Disc. Mech.: N

3. School District where library outlet/branch is located: RICHMOND PUBLIC SCHOOLS

4. Discount: ~~80%~~ 90

1. Library Name: NORTH AVENUE LIBRARY FSCS: VA 0068 009

2. Entity Number: 212145

New Library Construction: N

Administrative Entity: N

Non Instructional Facility: N

Urban/Rural: Urban

Alt. Disc. Mech.: N

3. School District where library outlet/branch is located: RICHMOND PUBLIC SCHOOLS

4. Discount: ~~80%~~ 90

1. Library Name: RICHMOND PUBLIC LIBRARY FSCS: VA 0068 000

2. Entity Number: 126511

New Library Construction: N

Administrative Entity: N

Non Instructional Facility: N

Urban/Rural: Urban

Alt. Disc. Mech.: N

3. School District where library outlet/branch is located: RICHMOND PUBLIC SCHOOLS

4. Discount: ~~80%~~ 90

1. Library Name: WEST END BRANCH LIBRARY FSCS: VA 0068 010

2. Entity Number: 25158

New Library Construction: N

Administrative Entity: N

Non Instructional Facility: N

Urban/Rural: Urban

Alt. Disc. Mech.: N

3. School District where library outlet/branch is located: RICHMOND PUBLIC SCHOOLS

4. Discount: ~~80%~~ 90

1. Library Name: WESTOVER HILLS BRANCH LIBRARY FSCS: VA 0068 011

2. Entity Number: 25150

New Library Construction: N

Administrative Entity: N

Non Instructional Facility: N

Urban/Rural: Urban

Alt. Disc. Mech.: N

3. School District where library outlet/branch is located: RICHMOND PUBLIC SCHOOLS

4. Discount: ~~80%~~ 90

Previous

Display Entire Application

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Total Student Count should be 24,211
F/R Eligible should be 18,561